

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF DEBTORS' ONE HUNDRED THIRTEENTH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
DEBTORS' COUNSEL, AMANDA HENDY, AT 212-310-8722.**

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Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11 Case No.
 :
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)
 :
Debtors. : (Jointly Administered)
-----X

**NOTICE OF HEARING ON DEBTORS' ONE HUNDRED THIRTEENTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY INSURANCE CLAIMS)**

PLEASE TAKE NOTICE that on March 14, 2011, Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors in possession (collectively, the "Debtors"), filed their one hundred thirteenth omnibus objection to claims (the "Debtors' One Hundred Thirteenth Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Debtors' One Hundred Thirteenth Omnibus Objection to

Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **April 28, 2011 at 10:00 a.m. (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Debtors' One Hundred Thirteenth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Shai Y. Waisman, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq. and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.); so as to be so filed and received by no later than **April 13, 2011 at 4:00 p.m. (prevailing Eastern Time)** (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Debtors' One Hundred Thirteenth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors' One Hundred Thirteenth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: March 14, 2011
New York, New York

/s/ Shai Y. Waisman
Shai Y. Waisman

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.
 :
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)
 :
Debtors. : (Jointly Administered)
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**DEBTORS' ONE HUNDRED THIRTEENTH OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY INSURANCE CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED
PROOFS OF CLAIM. PARTIES RECEIVING THIS ONE HUNDRED THIRTEENTH
OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS
OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN
THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO
DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
DEBTORS' COUNSEL, AMANDA HENDY, AT 212-310-8722.**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors in possession (collectively, the “Debtors”), respectfully represent as follows:

Relief Requested

1. The Debtors file this one hundred thirteenth omnibus objection to claims (the “One Hundred Thirteenth Omnibus Objection to Claims”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the “Procedures Order”), seeking to disallow and expunge certain claims for which the Debtors have no liability.

2. The proofs of claim listed on Exhibit A annexed hereto (collectively, the “No Liability Insurance Claims”) were filed against the Debtors based upon insurance policies and related agreements (collectively, the “Insurance Policies”) issued by insurance companies for the benefit of one or more of the Debtors. The Debtors have already paid all required premiums and other charges associated with the Insurance Policies and do not have any further obligations under such policies. The Debtors have no liability for the No Liability Insurance Claims and therefore request they be disallowed and expunged in their entirety.

3. The Debtors reserve all their rights to object on any basis to any No Liability Insurance Claim as to which the Court does not grant the relief requested herein.

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

5. Commencing on September 15, 2008 and periodically thereafter, (as applicable, the “Commencement Date”), LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of title 11 of the Bankruptcy Code. The Debtors’ chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On September 17, 2008, the United States Trustee for Region 2 (the “U.S. Trustee”) appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “Creditors’ Committee”).

7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as examiner in the above-captioned chapter 11 cases (the “Examiner”) and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee’s appointment of the Examiner. The Examiner filed its report with the Court on March 11, 2010 pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].

8. On July 2, 2009, this Court entered an order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases (the “Bar Date Order”) [Docket No. 4271].

9. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to up to 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

The No Liability Insurance Claims Should Be Disallowed and Expunged

10. In their review of the claims filed on the claims register in these chapter 11 cases, the Debtors have identified the No Liability Insurance Claims as claims that assert that one or more of the Debtors are liable for payments under various Insurance Policies. However, with respect to the subject Insurance Policies, the Debtors have already paid all required premiums, loss reimbursements, deposits and other charges associated with the Insurance Policies. Pursuant to the terms of the Insurance Policies, the Debtors do not have any current or future liability to the insurers under the Insurance Policies.

11. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). A proof of claim is “deemed allowed unless a party in interest objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

12. Unless the No Liability Insurance Claims are disallowed and expunged, parties who do not hold valid claims against the Debtors’ estates might nonetheless recover from the Debtors. Thus, the Debtors respectfully request the Court enter an order disallowing and expunging the No Liability Insurance Claims in their entirety.

Reservation of Rights

13. The Debtors reserve all rights to object on any basis to any No Liability Insurance Claim as to which the relief requested herein is not granted.

Notice

14. No trustee has been appointed in these chapter 11 cases. The Debtors have served notice of this objection, in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures [Docket No. 9635], on: (i) each claimant listed on Exhibit A; (ii) the U.S. Trustee; (iii) the attorneys for the Creditors' Committee; (iv) the Securities and Exchange Commission; (v) the Internal Revenue Service; (vi) the United States Attorney for the Southern District of New York; and (vii) all parties who have requested notice in these chapter 11 cases. The Debtors submit that no other or further notice need be provided.

15. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: March 14, 2011
New York, New York

/s/ Shai Y. Waisman
Shai Y. Waisman

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Attorneys for Debtors
and Debtors in Possession

EXHIBIT A

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13900 (JMP)	Lehman Commercial Paper Inc.	09/22/2009	32194	Undetermined	No Liability
2	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/22/2009	32195	Undetermined	No Liability
3	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13899 (JMP)	Lehman Brothers Derivative Products Inc.	09/22/2009	32196	Undetermined	No Liability
4	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13893 (JMP)	Lehman Brothers OTC Derivatives Inc.	09/22/2009	32197	Undetermined	No Liability
5	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13885 (JMP)	Lehman Brothers Commodity Services Inc.	09/22/2009	32199	Undetermined	No Liability

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
6	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13664 (JMP)	PAMI Statler Arms LLC	09/22/2009	32200	Undetermined	No Liability
7	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13600 (JMP)	LB 745 LLC	09/22/2009	32201	Undetermined	No Liability
8	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32202	Undetermined	No Liability
9	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13906 (JMP)	CES Aviation V LLC	09/22/2009	32203	Undetermined	No Liability
10	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13905 (JMP)	CES Aviation LLC	09/22/2009	32204	Undetermined	No Liability

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
11	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13902 (JMP)	Lehman Brothers Financial Products Inc.	09/22/2009	32206	Undetermined	No Liability
12	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13907 (JMP)	CES Aviation IX LLC	09/22/2009	32207	Undetermined	No Liability
13	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13908 (JMP)	East Dover Limited	09/22/2009	32208	Undetermined	No Liability
14	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQUIRE DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13907 (JMP)	CES Aviation IX LLC	09/22/2009	32579	Undetermined	No Liability
15	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQUIRE DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13908 (JMP)	East Dover Limited	09/22/2009	32580	Undetermined	No Liability

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
16	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13600 (JMP)	LB 745 LLC	09/22/2009	32582	Undetermined	No Liability
17	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13885 (JMP)	Lehman Brothers Commodity Services Inc.	09/22/2009	32584	Undetermined	No Liability
18	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32585	Undetermined	No Liability
19	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13899 (JMP)	Lehman Brothers Derivative Products Inc.	09/22/2009	32587	Undetermined	No Liability
20	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/22/2009	32589	Undetermined	No Liability

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
21	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13902 (JMP)	Lehman Brothers Financial Products Inc.	09/22/2009	32590	Undetermined	No Liability
22	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQUIRE DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13904 (JMP)	Lehman Scottish Finance L.P.	09/22/2009	32702	Undetermined	No Liability
23	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQUIRE DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13905 (JMP)	CES Aviation LLC	09/22/2009	32703	Undetermined	No Liability
24	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQUIRE DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	08-13906 (JMP)	CES Aviation V LLC	09/22/2009	32704	Undetermined	No Liability
25	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-12516 (JMP)	LB 2080 Kalakaua Owners LLC	09/22/2009	40281	Undetermined	No Liability

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
26	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-10560 (JMP)	LB Rose Ranch LLC	09/22/2009	40282	Undetermined	No Liability
27	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-10558 (JMP)	Structured Asset Securities Corporation	09/22/2009	40283	Undetermined	No Liability
28	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-10137 (JMP)	BNC Mortgage LLC	09/22/2009	40284	Undetermined	No Liability
29	ACE AMERICAN INSURANCE COMPANY C/O MARGERY N. REED, ESQ. DUANE MORRIS LLP 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-10108 (JMP)	Luxembourg Residential Properties Loan Finance S.a.r.l.	09/22/2009	40285	Undetermined	No Liability
30	ACE AMERICAN INSURANCE COMPANY C/O DUANE MORRIS, LLP ATTN: MARGERY N. REED, ESQUIRE 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-17505 (JMP)	LB Preferred Somerset LLC	06/10/2010	66815	Undetermined	No Liability

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
31	ACE AMERICAN INSURANCE COMPANY C/O DUANE MORRIS, LLP ATTN: MARGERY N. REED, ESQUIRE 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-17503 (JMP)	LB Somerset LLC	06/10/2010	66816	Undetermined	No Liability
32	ACE AMERICAN INSURANCE COMPANY C/O DUANE MORRIS, LLP ATTN: MARGERY N. REED, ESQUIRE 30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196	09-17331 (JMP)	Merit, LLC	06/10/2010	66817	Undetermined	No Liability
33	ARCH ARCH INSURANCE COMPANY ONE LIBERTY PLAZA 53RD FLOOR NEW YORK, NY 10006	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32210	Undetermined	No Liability
34	ARCH ARCH SPECIALTY INSURANCE COMPANY 53RD FLOOR NEW YORK, NY 10006	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32281	Undetermined	No Liability
35	ARCH 1 LIBERTY PLAZA - 17TH FL NEW YORK, NY 100061414	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32282	Undetermined	No Liability
36	ARCH ARCH INSURANCE COMPANY ONE LIBERTY PLAZA 53RD FLOOR NEW YORK, NY 10006	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32285	Undetermined	No Liability

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 113: EXHIBIT A - NO LIABILITY INSURANCE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
37	ARCH ARCH INSURANCE COMPANY ONE LIBERTY PLAZA 53RD FLOOR NEW YORK, NY 10006	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32286	Undetermined	No Liability
38	ARCH INSURANCE COMPANY EXECUTIVE ASSURANCE CLAIMS (CLAIM NO.: IAP0018995-01) ONE LIBERTY PLAZA, 53RD FLOOR NEW YORK, NY 10006	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32283	Undetermined	No Liability
39	ARCH INSURANCE COMPANY 1 LIBERTY PLZ FL 17 NEW YORK, NY 100061415	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32284	Undetermined	No Liability
TOTAL						\$0.00	

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING DEBTORS' ONE HUNDRED THIRTEENTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY INSURANCE CLAIMS)**

Upon the one hundred thirteenth omnibus objection to claims, dated March 14, 2011 (the "One Hundred Thirteenth Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking disallowance and expungement of the No Liability Insurance Claims on the basis that the Debtors have no liability for such claims, all as more fully described in the One Hundred Thirteenth Omnibus Objection to Claims; and due and proper notice of the One Hundred Thirteenth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the One Hundred Thirteenth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the One Hundred Thirteenth Omnibus Objection to Claims

¹ Terms not defined herein shall have the same meaning ascribed to them in the One Hundred Thirteenth Omnibus Objection to Claims.

establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the One Hundred Thirteenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order supersedes all previous orders regarding the No Liability Insurance Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that the Debtors' Court-appointed claims agent is authorized and directed to reflect the No Liability Insurance Claims as disallowed and expunged pursuant to this Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2011
New York, New York